

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION
CASE NO.: 1:20-cv-04874-SCJ**

MORGAN HOWARTH,

Plaintiff,

v.

HERO BUILD SOLUTIONS LLC,

Defendant.

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR ENTRY
OF DEFAULT FINAL JUDGMENT OF DAMAGES
AGAINST DEFENDANT HERO BUILD SOLUTIONS LLC**

This matter came before the Court upon Plaintiff's Motion for Entry of Default Final Judgment for Damages against Defendant HERO BUILD SOLUTIONS LLC.

The Court, having reviewed the pleadings, Plaintiff's Motion, the Declarations in Support, and being fully advised in the premises, and for good cause shown, hereby **GRANTS** the Motion and determines that Plaintiff, MORGAN HOWARTH, shall recover damages from Defendant HERO BUILD SOLUTIONS LLC, in the following amounts:

A. Copyright Infringement:

1. For actual/statutory damages for copyright infringement:

\$301,536.00.

B. Attorney's Fees and Costs

1. For reasonable attorney's fees: **\$3,435.00;**

2. For costs: **\$457.39.**

TOTAL RECOVERY FOR MORGAN HOWARTH: \$305,428.39.

ADDITIONALLY, THE COURT ALSO AWARDS PREJUDGMENT INTEREST on the total sum at the annual percentage rate calculated pursuant to 28 U.S.C. § 1961 from March 17, 2020 through the date of this judgment.

POST JUDGMENT INTEREST IS PAYABLE on all the above amounts allowable by law from the date this judgment is entered until the date this judgment is paid.

PERMANENT INJUNCTION

Defendant HERO BUILD SOLUTIONS LLC, its officers, agents, servants, employees and attorneys, and all persons in active concert or participation with any one or more of them, who receive actual notice by personal service or otherwise ARE HEREBY PERMANENTLY RESTRAINED AND ENJOINED from:

(a) directly or indirectly infringing Plaintiff's copyrights or continuing to market, offer, sell, dispose of, license, lease, transfer, publicly display, advertise, reproduce, develop, or manufacture any works derived or copied from any of

Plaintiff's copyrighted photographs or to participate or assist in any such activity;
and/or

(b) directly or indirectly reproducing, displaying, distributing, otherwise
using, or retaining any copy, whether in physical or electronic form, of any
copyrighted photographs.

The Court orders execution to issue for this judgment.

The Court denies all relief not granted in this judgment.

This is a FINAL JUDGMENT.

SO ORDERED

THIS ____ DAY OF _____, 2021

HONORABLE STEVE C. JONES
UNITED STATES DISTRICT JUDGE